

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAZAR MACOVSKI, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

GROUPON, INC., RICH WILLIAMS, and
MELISSA THOMAS,

Defendants.

Case No. 1:20-cv-02581

Honorable Matthew F. Kennelly

**LEAD PLAINTIFF'S UNOPPOSED MOTION FOR: (I) PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT; (II) CERTIFICATION OF THE SETTLEMENT
CLASS; AND (III) APPROVAL OF NOTICE OF SETTLEMENT**

Court-appointed Lead Plaintiff Fadi E. Rahal hereby respectfully moves the Court for an Order: (i) preliminarily approving the proposed settlement with Defendants Groupon, Inc., Rich Williams, and Melissa Thomas; (ii) certifying a settlement class as provided for in the Stipulation and Agreement of Settlement dated June 24, 2022; (iii) approving the form and method for giving notice to members of the settlement class; and (iv) scheduling a final approval hearing. Defendants do not oppose the relief requested by this motion.

The motion is based on this motion; the memorandum of law in support thereof; the Declaration of Leanne H. Solish, Esq. in Support of Lead Plaintiff's Unopposed Motion for: (I) Preliminary Approval of Class Action Settlement, (II) Certification of the Settlement Class, and (III) Approval of Notice of Settlement; all exhibits thereto; the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

Dated: June 27, 2022

Respectfully Submitted,

GLANCY PRONGAY & MURRAY LLP

/s/ Leanne H. Solish

Robert V. Prongay

Kara M. Wolke

Leanne H. Solish

Garth A. Spencer

1925 Century Park East, Suite 2100

Los Angeles, CA 90067

Telephone: (310) 201-9150

Email: rprongay@glancylaw.com

kwolke@glancylaw.com

lsolish@glancylaw.com

gspencer@glancylaw.com

KIRBY MCINERNEY LLP

Ira M. Press

Thomas W. Elrod

Andrew M. McNeela

250 Park Avenue, Suite 820

New York, NY 10177
Telephone: (212) 371-6600
Email: ipress@kmlp.com
telrod@kmlp.com
amcneela@kmlp.com

Co-Lead Counsel for Lead Plaintiff

POMERANTZ LLP

Louis C. Ludwig
10 South LaSalle Street, Suite 3505
Chicago, IL 60603
Telephone: (312) 377-1181
Email: lcludwig@pomlaw.com

Liaison Counsel for Lead Plaintiff

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On June 27, 2022, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Northern District of Illinois, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 27, 2022.

s/ Leanne H. Solish
Leanne H. Solish